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MEMO ENDORSED

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April 28, 2021

Via ECF

Hon. Andrew L. Carter
United States District Court, Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

**Re: 573 Fordham Dental P.C. et al v. The Hartford Financial Services Group Inc. et al.,
20 Civ. 8847 (S.D.N.Y.) — Joint Status Report**

Dear Judge Carter:

We write on behalf of all parties to the above action to provide a joint status report, as the Court directed. (ECF 17, at 6.)

By way of brief background, the plaintiffs are two dental offices that allege they are entitled to insurance coverage from the defendants for business income losses associated with the COVID-19 pandemic. The plaintiffs originally filed the case in state court, and, following removal, moved to remand. On April 15, 2021, the Court denied the motion and directed the parties to provide a joint status report by tomorrow.

Earlier today, the defendants filed a pre-motion letter in anticipation of moving to dismiss (*see* ECF 18) and the plaintiffs will file a response, in accordance with the Court's rules.

All parties respectfully request that discovery be stayed pending resolution of the motion, because the parties would prefer to not incur the substantial expense of discovery before the Court rules on the threshold question of whether the complaint states a claim for relief.

We thank the Court in advance for its consideration of this application.

Respectfully,

/s/ Charles Michael


Charles Michael

Hon. Andrew L. Carter
April 18, 2021
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cc: Randolph Janis, counsel for the plaintiffs
(by email to rjanis@douglasandlondon.com)

The request is **GRANTED**. Discovery is stayed pending resolution of the anticipated motion to dismiss.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

4/29/2021